

BOIES SCHILLER FLEXNER LLP
 RICHARD J. POCKER (NV Bar No. 3568)
 300 South Fourth Street, Suite 800
 Las Vegas, NV 89101
 Telephone: (702) 382-7300
 Facsimile: (702) 382-2755
 rpocker@bsfllp.com

BOIES SCHILLER FLEXNER LLP
 WILLIAM ISAACSON (*pro hac vice*)
 KAREN DUNN (*pro hac vice*)
 5301 Wisconsin Ave, NW
 Washington, DC 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 wisaacson@bsfllp.com
 kdunn@bsfllp.com

BOIES SCHILLER FLEXNER LLP
 STEVEN C. HOLTZMAN (*pro hac vice*)
 BEKO O. REBLITZ-RICHARDSON (*pro hac vice*)
 1999 Harrison Street, Suite 900
 Oakland, CA 94612
 Telephone: (510) 874-1000
 Facsimile: (510) 874-1460
 sholtzman@bsfllp.com
 brichardson@bsfllp.com

Attorneys for Plaintiffs Oracle USA, Inc.,
 Oracle America, Inc. and Oracle International
 Corp.

MORGAN, LEWIS & BOCKIUS LLP
 THOMAS S. HIXSON (*pro hac vice*)
 JOHN A. POLITO (*pro hac vice*)
 One Market, Spear Street Tower
 San Francisco, CA 94105-1596
 Telephone: 415.442.1000
 Facsimile: 415.442.1001
 thomas.hixson@morganlewis.com
 john.polito@morganlewis.com

DORIAN DALEY (*pro hac vice*)
 DEBORAH K. MILLER (*pro hac vice*)
 JAMES C. MAROULIS (*pro hac vice*)
 ORACLE CORPORATION
 500 Oracle Parkway, M/S 5op7
 Redwood City, CA 94070
 Telephone: 650.506.4846
 Facsimile: 650.506.7114
 dorian.daley@oracle.com
 deborah.miller@oracle.com
 jim.maroulis@oracle.com

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
 ORACLE AMERICA, INC., a Delaware
 corporation; and ORACLE INTERNATIONAL
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
 SETH RAVIN, an individual,

Defendants.

Case No 2:10-cv-0106-LRH-VCF

**ORACLE'S MOTION TO SEAL
 PORTIONS OF REPLY IN SUPPORT
 OF ORACLE'S RENEWED MOTION
 FOR ATTORNEYS' FEES**

1 Pursuant to the Stipulated Protective Order governing confidentiality of documents
2 entered by the Court on May 21, 2010, ECF No. 55 (“Protective Order”), and Rules 5.2 and
3 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc.,
4 and Oracle International Corporation (collectively “Oracle”) respectfully request that the Court
5 order the Clerk of the Court to file under seal certain portions of Oracle’s Reply In Support Of
6 Oracle’s Renewed Motion for Attorneys’ Fees (“Reply Brief”). These portions of Oracle’s
7 Reply Brief reflect information that Oracle, Rimini Street, Inc. (“Rimini”) or a third party has
8 designated “Confidential” or “Highly Confidential - Attorneys’ Eyes Only” under the Protective
9 Order. A public, redacted version of Oracle’s Reply Brief was filed on June 1, 2018, *see* ECF
10 No. 1152, and an unredacted version will be filed under seal with the Court.

11 The Protective Order states, “Counsel for any Designating Party may designate any
12 Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information –
13 Attorneys’ Eyes Only’ under the terms of this Protective Order ***only if such counsel in good***
14 ***faith believes that such Discovery Material contains such information and is subject to***
15 ***protection under Federal Rule of Civil Procedure 26(c)***. The designation by any Designating
16 Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential
17 Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the
18 Designating Party reasonably believes there is a valid basis for such designation.” Protective
19 Order ¶ 2 (emphasis supplied).

20 Rimini has designated information in Oracle’s Reply Brief as Highly Confidential -
21 Attorneys’ Eyes Only (“HC”). Oracle submits portions of the Reply Brief containing such
22 information under seal pursuant to the Protective Order based on Rimini’s representation that it
23 reasonably believes there is a valid basis under the Protective Order for its confidentiality
24 designations. Because the information was designated by Rimini, Oracle is not in a position to
25 explain why filing the redacted portions of the Reply Brief publicly would cause Rimini harm.

26 Oracle has submitted all other portions of Oracle’s Reply Brief to the Court’s public files,
27 which allow public access to all materials except for the portions discussed above. Accordingly,
28 the request to seal is narrowly tailored. For the foregoing reasons, Oracle respectfully requests

1 that the Court grant leave to file under seal the documents discussed above.

2 DATED: June 1, 2018

Morgan, Lewis & Bockius LLP

3 By: /s/ Thomas S. Hixson

4 Thomas S. Hixson
5 Attorneys for Plaintiffs
6 Oracle USA, Inc.,
7 Oracle America, Inc. and
8 Oracle International Corporation
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CERTIFICATE OF SERVICE

I certify that on June 1, 2018, I electronically transmitted the foregoing ORACLE'S
MOTION TO SEAL PORTIONS OF REPLY IN SUPPORT OF ORACLE'S RENEWED
MOTION FOR ATTORNEYS' FEES to the Clerk's Office using the Electronic Filing System
pursuant to Special Order No. 109.

Dated: June 1, 2018

Morgan, Lewis & Bockius LLP

By: /s/ Thomas Hixson
Thomas Hixson

Attorneys for Plaintiffs
Oracle USA, Inc.,
Oracle America, Inc. and
Oracle International Corporation